

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**
ASHEVILLE DIVISION
CASE NUMBER 1:20CV66

CARYN DEVINS STRICKLAND,)	
)	
Plaintiff,)	
)	
v.)	
)	
UNITED STATES OF AMERICA, <i>et al.</i> ,)	
)	
Defendants.)	
<hr/>		

**DEFENDANTS' RESPONSE TO PLAINTIFF'S NOTICE
OF SUPPLEMENTAL AUTHORITY, ECF NO. 422**

Pursuant to Local Civil Rule 7.1(j), Defendants respectfully submit this response to Plaintiff's Notice of Supplemental Authority, ECF No. 422, regarding a study by the Federal Judicial Center and National Academy of Public Administration. That study is not legal authority, and it has no relevance to Plaintiff's claims. Indeed, Plaintiff's notice does not meaningfully attempt to show otherwise. Instead, Plaintiff uses the notice as an opportunity to make separate legal arguments about the adequacy of training received by various individuals connected to this suit, and to cite additional judicial decisions. The Court should disregard those arguments, which violate the Local Rules. *See* LCvR 7.1(j) (stating that a notice of supplemental authority "must state the reasons for the supplemental citations, referring either to the page of the brief or to a point argued orally, but shall not contain any further argument").

The Court should also disregard any purported "reply" that Plaintiff may file relating to her notice. Plaintiff has filed such replies previously, *see* ECF No. 409, 424, but they are unauthorized by the Local Rules. *See* LCvR 7.1(j) (permitting a notice of supplemental authority and a response but not referencing any reply).

Dated: July 24, 2024

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

CARLOTTA P. WELLS
Assistant Branch Director

/s/ Joshua Kolsky
JOSHUA KOLSKY
Senior Trial Counsel
DOROTHY CANEVARI
MADELINE MCMAHON
Trial Attorneys, Federal Programs Branch
U.S. Department of Justice, Civil Division
1100 L Street, NW
Washington, DC 20001
Tel.: (202) 305-7664
Email: joshua.kolsky@usdoj.gov

Counsel for Defendants